



**LOWELL PUBLIC SCHOOLS**  
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To: Dr. Joel Boyd, Superintendent of Schools  
From: Dr. James Hall, Chief Operating Officer  
Date: October 27, 2021  
Re: Motion Response (percentage of students/staff vaccinated at each location)

To comply with the School Committee's vote of October 20, 2021, I have investigated various ways how the District could assess whether reaching the 80% vaccination threshold (see Exhibit A) is a possibility for each school. Currently, we plan on using SurveyMonkey to attempt to compile data for each school. This will involve gathering current email information for parents/guardians for each student for each school, running separate surveys for each school, and then combining this student data with separate surveys emailed to each staff member at each school. Preliminary results are anticipated no sooner than November 17, 2021 and no later than December 1, 2021. Based on our experience in running such a survey beginning on October 29, 2021 for Central Office personnel, I estimate that there will be 2 to 3 hours' time dedicated to each school survey in verifying and loading the emails and in processing the responses; however, there should be less than 30 seconds spent in responding to the survey for the survey participants.

We considered various other options after consulting with the City. From its own vaccination records, the City does not have a way to easily project how many vaccines that it has administered to our students and staff at a particular school. The City's COVID Response Commander opined that, for students, there would need to be a district-wide request to parents to provide vaccine documentation to the school nurses. I did not think we would get a high enough response rate to justify requesting this be done by parents at this time and the School Committee did not want parents/guardians to have to provide such documentation for this preliminary information gathering request. With regard to staff, a similar procedure was suggested to compile staff vaccine data. This method was also ruled out at this time, in part, due to the burden of requiring vaccine cards to be submitted for this preliminary survey.

Another method considered was to run a telephone survey. A telephone number associated with each student would be called and the person answering would press #1 or #2 to record the vaccination status on each student. In this scenario, we would not really know who is answering the phone. Additionally, there would be issues with the response rate. This telephone survey could also be repeated until a response is given or until the survey administrator determines that sufficient attempts have been made.

In my opinion, the best way to follow the School Committee's guidance on limiting the response burden was to send out an anonymous email survey to staff and to parents/guardians of each student which would record the responses and the percentage of responses without recording personal information. Such separate surveys for each school would re-send every few days to those who did not provide an initial response. We would be able to provide the response rate, number of times the survey was sent, and the vaccination rate from the survey results. Some of the shortcomings we would have to accept for this method would be not having the best email addresses for each parent, only sending the survey to one email address for each student (meaning a parent may receive separate emails for each student and some parents would not be involved if not the primary contact), and not having a high response rate.

## 80 PERCENT VACCINATION RATE THRESHOLD SCHOOL ATTESTATION FORM

At the special meeting of the Board of Elementary and Secondary Education (Board) on August 24, 2021, the Board voted to declare “exigent circumstances” pursuant to the Student Learning Time (SLT) regulations, 603 CMR 27.08 (1), and authorized the Commissioner of Elementary and Secondary Education to require masks for public school students (age 5 and above) and staff in all grades through at least October 1, 2021.

As of October 15, 2021, if a school demonstrates a vaccination rate of 80 percent or more of all students and staff in the school through an attestation form submitted to DESE, then vaccinated individuals in that school would no longer be subject to the mask requirement.<sup>1</sup> In alignment with statewide guidance, unvaccinated students and staff would be required to continue wearing masks.

On September 27, 2021, after consulting with medical experts and state health officials, the Commissioner extended the mandate through at least November 1, 2021.

Schools and districts that choose to avail themselves of the 80 percent vaccination rate threshold should **complete and return this attestation form to Rob Curtin** ([robert.c.curtin@mass.gov](mailto:robert.c.curtin@mass.gov)). Schools and districts should complete and return one form for each school that meets the 80 percent rate threshold within a district/network. The appropriate signatory must be an individual with the authority to attest to the information submitted for each school, such as the superintendent or executive director.

[ ] I confirm that the school identified below has met the 80 percent threshold rate per the guidelines set out in the DESE Policy on Vaccination Threshold Rate dated September 27, 2021.

Name of school/charter school/collaborative/other:

Name of district/network:

Name of individual completing the form:

Title of individual completing the form:

Signature of individual completing the form:

Date:

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<sup>1</sup> In the event that a school has already collected proof of vaccination and meet the 80 percent threshold, it may submit its attestation form before October 15 for consideration by the Department.



## DESE Policy on Vaccination Rate Threshold

September 27, 2021

At the special meeting of the Board of Elementary and Secondary Education (Board) on August 24, 2021, the Board voted to declare “exigent circumstances” pursuant to the Student Learning Time (SLT) regulations, 603 CMR 27.08 (1), and authorized the Commissioner of Elementary and Secondary Education to require masks for public school students (age 5 and above) and staff in all grades through at least October 1, 2021.

As of October 15, 2021, if a school demonstrates a vaccination rate of 80 percent or more of all students and staff in the school through an attestation form submitted to DESE, then vaccinated individuals in that school would no longer be subject to the mask requirement.<sup>1</sup> Whether or not a school or district avails themselves of the 80 percent vaccination off ramp is a local decision to be made by school and district leaders in consultation with local health officials. In alignment with statewide guidance, unvaccinated students and staff would be required to continue wearing masks. The Department will continue to work with medical advisers to explore other metrics to inform further off ramps for masks.

Schools that seek approval to lift the mask requirement must submit an attestation form to DESE for approval. DESE will respond to districts and schools within 2 business days of their submission. For questions regarding this information, please contact DESE’s Rapid Response Help Center at [anne.marie.stronach@mass.gov](mailto:anne.marie.stronach@mass.gov).

On September 27, 2021, after consulting with medical experts and state health officials, the Commissioner extended the mask mandate through at least November 1, 2021.

### Vaccination Rate Threshold

#### *Calculating the 80 percent threshold rate:*

- The 80 percent threshold rate is to be calculated on a school-by-school basis. The threshold must be calculated including all enrolled students in the building plus any staff member regularly providing in-school services.
  - “Any staff member regularly providing in-school services” includes contracted staff (e.g., itinerant staff), individuals engaged to provide goods or services (e.g., student teachers/tutors, food service workers), part-time employees, non-student facing school-based staff (e.g., clerks), coaches, after-school staff, etc.
  - District central office staff and other individuals who are in the school infrequently/briefly (e.g., parents, individuals making deliveries) should not be included in the 80 percent threshold calculation. Central office employees should be included in the calculation for a school if their offices are located within a school building.

#### *Collecting proof of vaccination:*

- Schools should determine a method to collect proof of COVID-19 vaccination for all eligible staff and students. An individual will be required to demonstrate proof that they have received either the required two doses of the Pfizer or Moderna or the single dose of the Johnson & Johnson’s

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<sup>1</sup> In the event that a school has already collected proof of vaccination and meet the 80 percent threshold, it may submit its attestation form before October 15 for consideration by the Department.

Janssen. An individual who received a vaccination outside of the country must have received a vaccine as approved by the World Health Organization (WHO).

- All documentation related to an individual's vaccination should be maintained *confidentially, and, in the case of a school's employee, should be held separate from their personnel file.*
- Individual proof of vaccination could include:
  - A signed self-attestation completed by the vaccinated individual or parent/guardian on behalf of the vaccinated student; or
  - Documentation provided to the individual by the Massachusetts Department of Public Health or a health care provider. Documentation may include but is not limited to a COVID-19 vaccination record card or a copy or digital picture of the vaccination record card, or a print-out from the Massachusetts Immunization Information System (MIIS).
- Approved designated staff may verify individual vaccination records or self-attestation forms using MIIS.

#### **Attestation to DESE**

- Each school that seeks approval to lift the state mask requirement must submit an attestation form to Rob Curtin ([robert.c.curtin@mass.gov](mailto:robert.c.curtin@mass.gov)) verifying at least 80 percent of the school's staff and students are fully vaccinated.
- The appropriate signatory on the attestation to DESE must be an individual with the authority to attest to the information submitted for each school, such as the superintendent or executive director.